

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ANGELE A. OZOMELEMAM,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07-804 (SLR)
)	
DELAWARE STATE UNIVERSITY,)	PUBLIC VERSION
an institution of higher education and)	
corporate body; ALLEN L. SESSOMS,)	
individually and in his official capacity)	
and as President of Delaware State)	
University; MARK FARLEY, individually)	
and in his official capacity as Vice President)	
for Human Resources and Legislative)	
Affairs of Delaware State University;)	
and DONALD HENRY, individually and)	
in his official capacity as Vice President)	
for Business and Finance of Delaware)	
State University,)	
)	
Defendants.)	

**DEFENDANTS' OPENING BRIEF IN SUPPORT OF THEIR
MOTION TO DISQUALIFY PLAINTIFF'S COUNSEL**

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NATURE AND STAGE OF PROCEEDINGS

REDACTED IN ITS ENTIRELY

SUMMARY OF ARGUMENT

REDACTED IN ITS ENTIRELY

STATEMENT OF FACTS

- A. **REDACTED IN ITS ENTIRELY**
- B. **REDACTED IN ITS ENTIRELY**

ARGUMENT

- I. **REDACTED IN ITS ENTIRELY**
- A. **REDACTED IN ITS ENTIRELY**
 - 1. **REDACTED IN ITS ENTIRELY**
 - B. **REDACTED IN ITS ENTIRELY**

CONCLUSION

REDACTED Defendants Delaware State University and the Individual Defendants therefore respectfully request that the Court disqualify and order the withdrawal of the law firm of Schmittinger & Rodriguez, P. A. and the individual attorneys involved from representation of plaintiff Angele Ozoemelam from all further proceedings in this action.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

By: /s/ Sarah E. DiLuzio

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CERTIFICATE OF SERVICE

I hereby certify this 21st day of February, 2008 that the foregoing was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the following counsel of record that the document is available for viewing and downloading from CM/ECF:

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